

CH

AUGUST 13, 2008

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
CHICAGO, ILLINOIS**

VMJ

RECEIVED
JUL 31 2008
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

Peter Peretz,

Plaintiff

v

Gregory Sims, Robert W. Evans, and
Thomas L. Patterson

Co-Defendants)

08cv4346

JUDGE GUZMAN

MAG. JUDGE DENLOW

COMPLAINT FOR VIOLATIONS OF TITLE VII OF THE CIVIL RIGHTS ACT

Now comes Peter Peretz, plaintiff, pro se, by and as his Complaint against Gregory Sims, Warden of the Taylorville Correctional Facility and Robert W. Evans and Thomas L. Patterson, Counselors at the Taylorville Correctional facility, co-defendants, states as follows:

1. Peter Peretz, plaintiff, has been a resident of the State of Illinois and a citizen of the northern district of Illinois as well as a citizen of the State of Illinois at all times relevant to this Complaint.
2. Gregory Sims, defendant, was Warden of the Taylorville Correctional Facility, a correctional facility operated by the State of Illinois at all times related to this Complaint. He was employed as Warden of that facility by the State of Illinois.
3. Robert W. Evans and Thomas L. Patterson, co- defendants, were Counselors at Taylor Correctional Facility, a correctional facility operated by the State of Illinois at all times related to this Complaint. They were employed by the State of Illinois at that facility.
4. On or about March 12, 2007, the plaintiff was sentenced to a prison term of eighteen months (18 months) by Judge Burke in the Circuit Court of the 18th Judicial Circuit in Wheaton, Illinois.

5. Based upon then existing guidelines of the Illinois Department of Corrections, the defendant was eligible for release from the Department of Corrections on or about May 17, 2007; 93 days earlier than he was actually released.

6. Nonetheless all co-defendants refused to compute the release date as required by guidelines, rules and regulations of the Illinois State Department of Corrections to grant meritorious conduct credit to Plaintiff.

7. The plaintiff repeatedly informed all defendants that they had incorrectly calculated his prison release date by intentionally refusing to grant him meritorious conduct credit.

8/ The plaintiff should have been released from the Illinois Department of Correction on or about May 17, 2007.

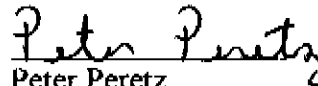
9. However, plaintiff was wrongfully detained as a prisoner within the Illinois Department of Corrections until August 2007, when he was released.

10. Plaintiff spent an extra, and unnecessary, 93 days, within the Illinois Department of Corrections prisons because of the intentional and wrongful acts of the Warden and Counselors, acting under color of State law.

11. The Civil Rights of the Plaintiff were violated by the above described intentional and wrongful acts of all of the co-defendants.

Wherefore, based upon violations of Section 1982 of Title VII of the Civil Rights Act, the plaintiff prays this Court award him damages against Gregory Sims, Robert W. Evans, and Thomas L. Patterson co- defendants in an amount in excess of \$75,000, plus his costs and attorney fees.

Respectfully submitted,



Peter Peretz,
Plaintiff

June 9, 2009

Peter Peretz
Pro Se
Plaintiff
108 Nina Lane
Bartlett, IL 60103
630-497-8890